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[Additional Counsel appear on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

DAVID C. WESTON, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

PG&E CORPORATION, ANTHONY F.
EARLEY, JR., JASON P. WELLS, GEISHA
J. WILLIAMS, CHRISTOPHER P. JOHNS,
DINYAR B. MISTRY, and DAVID S.
THOMASON,

Defendants.

Case No. 3:18-cv-03509-RS

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO RELATE CASES**

Hon. Richard Seeborg

1 WHEREAS, on June 12, 2018, plaintiff David C. Weston filed a securities class action
2 complaint against PG&E Corporation (“PG&E”) and its current and former officers, asserting
3 violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 related to alleged
4 misrepresentations in connection with wildfires that started on or about October 8, 2017 in
5 Northern California (the “North Bay Wildfires”), styled *Weston v. PG&E Corporation, et al.*,
6 No. 3:18-cv-03509-RS (the “*Weston Action*”);

7 WHEREAS, on June 14, 2018, plaintiff Jon Paul Moretti filed a securities class action
8 complaint in this District against the same defendants as in the *Weston Action* predicated on
9 nearly identical allegations, and asserting identical claims, styled *Moretti v. PG&E Corporation*
10 *et al.*, No. 3:18-cv-03545-VC (the “*Moretti Action*,” and together with the *Weston Action*, the
11 “Securities Class Actions”);

12 WHEREAS, on August 14, 2018, the Honorable Richard Seeborg ordered the Securities
13 Class Actions related, and directed the Clerk of the Court to reassign the *Morreti Action* to Judge
14 Seeborg;

15 WHEREAS, on August 3, 2018, plaintiff Oklahoma Firefighters Pension and Retirement
16 System filed a derivative action in this District against Nominal Defendant PG&E and certain of
17 its current and former officers and directors, predicated on allegations concerning PG&E’s
18 conduct related to the North Bay Wildfires, styled *Oklahoma Firefighters Pension and*
19 *Retirement System v. Lewis Chew, et al.*, No. 3:18-cv-04698 (the “*Derivative Action*”);

20 WHEREAS, on August 20, 2018, the *Derivative Action* was assigned to the Honorable
21 Phyllis J. Hamilton;

22 WHEREAS, the undersigned parties agree that the *Derivative Action* and the Securities
23 Class Actions are related pursuant to Civil Local Rule 3-12(a), because “(1) [t]he actions concern
24 substantially the same parties, property, transaction or event; and (2) [i]t appears likely that there
25 will be an unduly burdensome duplication of labor and expense or conflicting results if the cases
26 are conducted before different Judges”; and

1 WHEREAS, nothing herein shall be deemed to constitute a waiver of any rights,
2 defenses, objections, or any other application to any court that any undersigned party may have
3 with respect to the Securities Class Actions or the Derivative Action.

4 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, pursuant to
5 Civil Local Rules 3-12 and 7-12, and subject to the approval of the Court, that the Derivative
6 Action and the Securities Class Actions are related, and that the Derivative Action shall be
7 reassigned to the Honorable Richard Seeborg.

8
9 Dated: August 22, 2018

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24 Dated: August 22, 2018

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*Attorneys for Plaintiff Oklahoma
Firefighters Pension and Retirement System*

~~PROPOSED~~ ORDER

Based on the foregoing stipulation and good cause having been shown, the Court hereby GRANTS the parties' stipulation.

IT IS HEREBY ORDERED THAT *Oklahoma Firefighters Pension and Retirement System v. Chew, et al.*, No. 3:18-cv-04698 (the "Derivative Action"), is related to *Weston v. PG&E Corporation, et al.*, No. 3:18-cv-03509 and *Moretti v. PG&E Corporation et al.*, No. 3:18-cv-03545. Pursuant to Civil Local Rule 3-12(f)(3), the Clerk shall reassign the Derivative Action to the undersigned.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

8/29/18

Date



Hon. Richard Seeborg
United States District Judge